

CACFP Policy Memorandum 2006-08

TO: Family Day Care Home Sponsors Participating
In the Child and Adult Care Food Program (CACFP)

FROM: Denise Hagan, Program Manager
Community Nutrition Branch
Nutrition and Health Services

RE: Monitor Visits and Review Averaging

DATE: October 24, 2005

We issued Policy Memo 2004-02 on August 1, 2003 to provide guidance to sponsors for the following: 1) when adding providers, 2) the requirement of an office within 100 miles of each day care home sponsored; 3) the requirement of one full-time staff equivalent for each 50 homes sponsored; 4) criteria for providers requiring 6 visits per year; and 5) that two of the three required reviews per provider be unannounced.

This current policy memo addresses changes that have been made to our State Agency monitor review requirements and the use of review averaging.

Due to the new requirements in the Second Interim Rule that now require household contacts and unannounced reviews, we have changed the criteria for those providers who require four (4) monitor reviews per year. Initially, we required six (6) monitor reviews within a 12-month period starting October 1 of each year for providers meeting the following criteria:

- 1) Providers who operate on a split shift (a monitor review must be conducted for each shift);
- 2) Providers who care for children on weekends (Providers claiming reimbursement for meals on weekends must be monitored during the weekend meal services);
- 3) Providers who keep an outside child all day and do not claim lunch;
- 4) Providers who claim reimbursement for a meal served on a holiday (Providers claiming reimbursement for meals on a holiday must be monitored during the meal service); or
- 5) Providers who are located 100 miles or more from the Sponsoring Organization's office.

For FY 2005, we reduced the number of monitor reviews for providers meeting these criteria from six (6) to four (4) required reviews.

For FY 2006, we are requiring four (4) monitor reviews for providers who meet the following criteria:

- 1) Providers who keep an outside child all day and do not claim lunch; or
- 2) Providers who are located 100 miles or more from the Sponsoring Organization's office.

For those providers requiring four (4) monitor reviews, no more than three (3) months can lapse between reviews.

Due to the potential number of unannounced reviews that will have to be conducted as a result of triggers for household contacts, we feel that reducing the criteria for 4 monitor reviews is appropriate. You will also note that the FY 2006 FDCH Sponsor/Provider Agreement sent to you on October 20, 2005 for new providers reflects this change in sponsor responsibilities.

Also, all FDCH sponsors have now made a determination to their providers as to whether weekends may or may not be claimed for reimbursement. In our review of sponsor agreements, no sponsor is allowing providers to claim meals on holidays. We have found that a large portion of providers care for children on split shifts, and they will potentially have more reviews as a result of the requirements for household contacts.

As a reminder, the following items require sponsors to conduct a household contact:

- 1) Inconsistency between meal counts and attendance (sign-in/out sheets);
- 2) Repeated absences by the child care home provider at the time of an unannounced monitor review;
- 3) Block claiming (number of meals claimed for one or more meal types is identical for 15 consecutive days).

The Second Interim Rule made the monitor review requirements more consistent for homes and centers, in that a monitor review is required of all new facilities (centers and homes) **within the first 4 weeks** of operation. Please remember that all providers **must** receive two unannounced monitor reviews per year. The State Agency requires that a meal service be observed during each monitor review.

Another option added to the monitor review cycle was that of review averaging. Review averaging: 1) allows up to 9 months between reviews for those homes/centers receiving two reviews per year; 2) requires at least 3 reviews of facilities with block claims or serious deficiencies; 3) State Agencies may prohibit sponsors' use, if abused; and 4) State Agencies may require sponsors to notify them of their use of review averaging.

Only one FDCH sponsor has opted to use review averaging for FY 2006. When using review averaging, sponsors should consider the following:

- 1) Construct a profile to see which homes need more or fewer reviews;
- 2) Develop a review plan or program that tracks reviews;
- 3) The monitor review plan must be flexible in order to anticipate additional unannounced reviews and reviews of seriously deficient providers;
- 4) Anticipate that changes will be made to the monitor review schedule.

It is anticipated that providers who are new, have had serious deficiencies, review problems, or a combination of factors would require more monitor reviews. In order to average reviews, provider visits need to be rated (i.e., A, B, C, D). The rating system used by the sponsor must be in writing.

Should you have any questions, please contact Susanne Hubbard, Elaine Jett, or Denise Hagan at 502/564-5625.